

Attachment 1 to EXHIBIT A-
Attorney Fee Ledger

Time Sheet

08/13/2019

Jimenez, Ramon vs. Best Behavioral Healthcare

Date Range: 1/1/1980 - 8/13/2019

Status: Pending/Released/Transferred/Exception

Date	Attorney	Hrs	Recorder	Timekeep	Amount
10/27/2017	AZM	.90	AZM	AZM	\$382.50
				Prepare for and participate in initial telephone conference with client.	
10/30/2017	AZM	.50	AZM	AZM	\$212.50
				Research regarding defendant, including preliminary review of website, for information relevant to independent contractor analysis.	
11/15/2017	AZM	.30	AZM	AZM	\$127.50
				Receive and review additional client documents.	
12/18/2017	AZM	.20	AZM	AZM	\$85.00
				Begin drafting complaint.	
01/15/2018	AZM	.30	AZM	AZM	\$127.50
				Telephone conference with client to follow up on factual information needed for complaint.	
01/17/2018	AZM	.50	AZM	AZM	\$212.50
				Additional research regarding appropriate individual defendant(s) and independent contractor classification, including review of website information regarding founding of company, purpose of company, indicia that psychotherapists and others are treated as employees.	
02/21/2018	AZM	.70	AZM	AZM	\$297.50
				Revise complaint.	
03/06/2018	AZM	.20	AZM	AZM	\$85.00
				Finalize and file complaint.	
04/25/2018	AZM	.10	AZM	AZM	\$42.50
				Review affidavits of service to confirm sufficiency of service. Consider motion for clerk's default.	
05/02/2018	AZM	.10	AZM	AZM	\$42.50
				Telephone conference with L. Hannah re: extension and potential defenses.	
05/02/2018	AZM	.10	AZM	AZM	\$42.50
				Receive and review correspondence from opposing counsel L. Hannah confirming prior conversation re: extension of time to answer complaint, and confirming no opposition to extension to 5/11.	
05/11/2018	AZM	.30	AZM	AZM	\$127.50
				Receive and review answer and affirmative defenses and consider motion to strike.	
05/15/2018	AZM	.30	AZM	AZM	\$127.50
				Receive and review scheduling order and order regarding arbitration.	
05/29/2018	AZM	.20	AZM	AZM	\$85.00
				Correspondence to opposing counsel re: motion to strike affirmative defenses 4 and 6.	
06/05/2018	AZM	.80	AZM	AZM	\$340.00
				Prepare initial draft of discovery requests.	
06/15/2018	AZM	.70	AZM	AZM	\$297.50
				Revise and finalize discovery requests.	
06/30/2018	AZM	.50	AZM	AZM	\$212.50
				Initial review of BBH initial document production, received on 6/26.	
07/03/2018	AZM	.60	AZM	AZM	\$255.00
				Initial review and analysis of additional documents produced by Defendants, including comparison of damages analyses charts, which appear to be different between two productions.	

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07/17/2018	AZM	3.50	AZM	AZM	\$1,487.50
				Review and analyze documents produced in discovery and begin preparation of deposition outlines for corporate representative and individual defendant, including identification of exhibits.	
07/17/2018	AZM	.30	AZM	AZM	\$127.50
				Prepare correspondence regarding discovery deficiencies to L. Hannah.	
07/19/2018	AZM	.10	AZM	AZM	\$42.50
				Follow up by email and telephone with L. Hannah regarding discovery deficiencies.	
07/19/2018	AZM	3.70	AZM	AZM	\$1,572.50
				Research and analyze cases regarding independent contractor misclassification, particularly in healthcare industry but also in other analagous circumstances, in preparation for depositions and outlines for same, continue preparation for corporate representative deposition and individual defendant deposition.	
07/22/2018	AZM	.50	AZM	AZM	\$212.50
				Review additional client documents prior to production.	
07/24/2018	AZM	4.50	AZM	AZM	\$1,912.50
				Meeting with client to review documents and prepare for client's deposition.	
07/24/2018	AZM	6.20	AZM	AZM	\$2,635.00
				Continue preparation of deposition outlines for depositions of corporate representative, and individual defendant, and prepare for depositions of additional BBH employees, including psychotherapists and billing employees.	
07/24/2018	AZM	.30	AZM	AZM	\$127.50
				Finalize subpoena to Community Behavioral Health seeking documents related to client's work and defendant's affirmative defenses.	
07/26/2018	AZM	.80	AZM	AZM	\$340.00
				Review and analyze Defendants' responses to discovery.	
07/27/2018	AZM	3.00	AZM	AZM	\$1,275.00
				Prepare for and defend client's deposition.	
07/27/2018	AZM	4.40	AZM	AZM	\$1,870.00
				Take deposition of Michael Nelson, corporate representative (agreed to continue deposition).	
07/31/2018	AZM	.80	AZM	AZM	\$340.00
				Prepare motion to modify scheduling order.	
08/03/2018	AZM	.90	AZM	AZM	\$382.50
				Finalize, including adding record citations, and file motion to modify scheduling order.	
08/07/2018	AZM	.40	AZM	AZM	\$170.00
				Receive and review amended discovery responses.	
08/07/2018	AZM	.50	AZM	AZM	\$212.50
				Correspondence with L. Hannah regarding discovery deficiencies.	
08/07/2018	AZM	.20	AZM	AZM	\$85.00
				Correspondence with L. Hannah regarding proposed resolution of \$22,500.00, inclusive of all damages to client, fees and costs.	
08/08/2018	AZM	.30	AZM	AZM	\$127.50
				Correspondence with opposing counsel regarding discovery deficiencies.	

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08/08/2018	AZM	.80	AZM	AZM	\$340.00
				Review additional documents Defendants produced today.	
08/09/2018	AZM	.30	AZM	AZM	\$127.50
				Telephone conference with counsel for Community Behavioral Health Services regarding billing for client's services, that BBH has not had to pay anything back, obligations of individual practitioners and groups in CBH network.	
08/09/2018	AZM	1.90	AZM	AZM	\$807.50
				Review additional documents produced by Defendants today, including WHD opinion, policies, manuals, and unemployment information.	
08/09/2018	AZM	.40	AZM	AZM	\$170.00
				Correspondence with L. Hannah regarding continued discovery deficiencies.	
08/13/2018	AZM	.90	AZM	AZM	\$382.50
				Review documents and prepare correspondence to L. Hannah re: continued discovery deficiencies in effort to avoid motion to compel.	
08/13/2018	AZM	1.50	AZM	AZM	\$637.50
				Review Community Behavioral Health documents responsive to subpoena.	
08/15/2018	AZM	3.60	AZM	AZM	\$1,530.00
				Prepare motion to compel.	
08/16/2018	AZM	2.80	AZM	AZM	\$1,190.00
				Finalize and file motion to compel.	
08/21/2018	AZM	.20	AZM	AZM	\$85.00
				Telephone conference with L. Hannah regarding discovery.	
08/21/2018	AZM	.30	AZM	AZM	\$127.50
				Review Defendants' document production for documents alleged to contain links to employee manual and produced P&P Manual. Neither exists in the production.	
08/21/2018	AZM	.30	AZM	AZM	\$127.50
				Prepare correspondence to L. Hannah regarding continued failure to produce relevant and discoverable documents.	
08/21/2018	AZM	.00	AZM	AZM	\$0.00
				Receive and review email from Judge Pratter's clerk, J. Hill, advising that extension of deadlines will be granted.	
08/22/2018	AZM	.20	AZM	AZM	\$85.00
				Review Defendants' opposition to motion to compel.	
08/22/2018	AZM	.50	AZM	AZM	\$212.50
				Review additional documents produced by Defendants.	
08/23/2018	AZM	.80	AZM	AZM	\$340.00
				Prepare reply on motion to compel.	
08/23/2018	AZM	.50	AZM	AZM	\$212.50
				Review company handbook.	
08/24/2018	AZM	2.20	AZM	AZM	\$935.00
				Revise and finalize reply on motion to compel and, in connection with same, review and analyze alleged P&P manual to compare for similarities to BBH manual portions produced. Relevant to BBH's defense that it did not set the rules and was rather just beholden to rules set by clients.	

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Date	Attorney	Hrs	Recorder	Timekeep	Amount
08/24/2018	AZM	9.20	AZM	AZM	\$3,910.00
				In light of Court's changed position regarding extension on summary judgment deadline and extending deadlines, prepare Plaintiff's memorandum of law in support of summary judgment, including legal research in support of same and preparation of client's declaration.	
08/24/2018	AZM	.20	AZM	AZM	\$85.00
				Review new produced discovery responses and initial disclosures.	
08/24/2018	AZM	.10	AZM	AZM	\$42.50
				Correspondence with L. Hannah regarding documents promised but not produced.	
08/25/2018	AZM	8.20	AZM	AZM	\$3,485.00
				Prepare statement of facts in support of motion for summary judgment.	
08/26/2018	AZM	9.50	AZM	AZM	\$4,037.50
				Revise motion for summary judgment and statement of facts. Additional legal research regarding each factor in independent contractor analysis and damages.	
08/27/2018	AZM	7.20	AZM	AZM	\$3,060.00
				Edit and finalize motion for summary judgment, including record citations, statement of facts, memorandum of law.	
08/29/2018	AZM	1.40	AZM	AZM	\$595.00
				Review additional documents produced by Defendants.	
08/30/2018	AZM	.30	AZM	AZM	\$127.50
				Telephone conference with client regarding potential resolution.	
08/30/2018	AZM	.30	AZM	AZM	\$127.50
				Review additional documents produced by Defendants (214-444, but many produced already).	
08/30/2018	AZM	.20	AZM	AZM	\$85.00
				Receive and review settlement offer of \$4,000.00 including fees and costs, and review same with client.	
08/31/2018	AZM	1.00	AZM	AZM	\$425.00
				Prepare for and participate in hearing with Court on motion to compel discovery.	
08/31/2018	AZM	.40	AZM	AZM	\$170.00
				Correspondence with L. Hannah proposing resolution at \$31,000.00, receipt and review of response rejecting same eight minutes later, and response to same.	
08/31/2018	AZM	1.20	AZM	AZM	\$510.00
				Continue preparation for additional depositions of Defendants' employees Dominguez, Brown and Purdy, and individual defendant.	
08/31/2018	AZM	.50	AZM	AZM	\$212.50
				Prepare for and participate in telephone conference with Community Behavioral Health counsel regarding issues relevant to enterprise coverage, relevant manuals and policies, and issues relating to control factor of independent contractor analysis.	
09/06/2018	AZM	.10	AZM	AZM	\$42.50
				Review order on motion to compel.	
09/06/2018	AZM	2.20	MB	AZM	\$935.00
				Take deposition of Amarilis LaFontaine (Part 1).	
09/06/2018	AZM	2.00	MB	AZM	\$850.00
				Continue deposition of Michael Nelson, corporate representative.	

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09/06/2018	AZM	.50	AZM	AZM	\$212.50
				Correspondence with opposing counsel regarding continued discovery deficiencies.	
09/07/2018	AZM	.20	AZM	AZM	\$85.00
				Edit subpoena to BBH accountant.	
09/07/2018	AZM	1.20	MB	AZM	\$510.00
				Take deposition of Dominique Dominguez (Part 1). Witness had to leave early due to scheduling issue. Agreed to continue deposition.	
09/07/2018	AZM	.70	MB	AZM	\$297.50
				Take deposition of Dr. Willie Brown.	
09/07/2018	AZM	1.00	MB	AZM	\$425.00
				Take deposition of Mark Purdy	
09/07/2018	AZM	2.60	MB	AZM	\$1,105.00
				Continue deposition of Amarilis LaFontaine	
09/20/2018	AZM	2.30	AZM	AZM	\$977.50
				Prepare for continued deposition of Dominguez, and prepare for depositions of Salcedo, and Ramirez.	
09/21/2018	AZM	5.00	AZM	AZM	\$2,125.00
				Take depositions of Salcedo, Dominguez, and Ramirez.	
09/25/2018	AZM	.50	AZM	AZM	\$212.50
				As Defendants continue to refuse to admit enterprise coverage, research for subpoena to Dell, and contact Dell In-House counsel regarding declaration.	
09/26/2018	AZM	.20	AZM	AZM	\$85.00
				Finalize subpoena to Dell for documents supporting enterprise coverage.	
10/01/2018	AZM	.10	AZM	AZM	\$42.50
				Telephone call with Dell attorney re: declaration and receipt and review of signed declaration.	
10/04/2018	AZM	8.20	AZM	AZM	\$3,485.00
				Revise motion for summary judgment to add facts and law regarding individual liability and enterprise coverage, including review of deposition transcripts for citations relating to same.	
10/08/2018	AZM	.90	AZM	AZM	\$382.50
				Review and analyze Defendants' motion for summary judgment.	
10/08/2018	AZM	.10	AZM	AZM	\$42.50
				Communication with Defendants' counsel to inform him of non-compliance with court rules with respect to format of Defendants' summary judgment motion.	
10/29/2018	AZM	.90	AZM	AZM	\$382.50
				Review Defendants' opposition to motion for summary judgment.	
10/30/2018	AZM	2.20	AZM	AZM	\$935.00
				Begin preparation of opposition to Defendants' motion for summary judgment, including response to statement of facts.	
10/31/2018	AZM	3.00	AZM	AZM	\$1,275.00
				Continue preparation of opposition to Defendants' motion for summary judgment, including response to statement of facts.	
11/01/2018	AZM	2.20	AZM	AZM	\$935.00
				Finalize and file opposition to Defendants' motion for summary judgment.	

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Date	Attorney	Hrs	Recorder	Timekeep	Amount
11/01/2018	AZM	2.50	AZM	AZM	\$1,062.50
				Prepare reply in further support of plaintiff's motion for summary judgment.	
11/02/2018	AZM	3.20	AZM	AZM	\$1,360.00
				Finalize and file Plaintiff's reply in further support of motion for summary judgment.	
01/17/2019	AZM	3.50	MB	AZM	\$1,487.50
				Prepare for oral argument, including review of motions and all exhibits.	
01/18/2019	AZM	3.50	MB	AZM	\$1,487.50
				Prepare for and participate in oral argument	
01/22/2019	AZM	.40	MB	AZM	\$170.00
				Telephonic conference with client regarding status and options moving forward.	
01/23/2019	AZM	.40	MB	AZM	\$170.00
				Correspondence to opposing counsel proposing resolution at \$73,000.00, inclusive of all damages to client, fees and costs.	
02/04/2019	AZM	.20	MB	AZM	\$85.00
				Prepare correspondence to Court regarding mediation.	
02/27/2019	AZM	1.30	MB	AZM	\$552.50
				Prepare settlement conference memorandum.	
02/27/2019	AZM	.10	MB	AZM	\$42.50
				Communication regarding settlement with opposing counsel.	
03/01/2019	AZM	.30	MB	AZM	\$127.50
				Telephone conference with Magistrate Judge Rice re:settlement conference.	
03/01/2019	AZM	.20	MB	AZM	\$85.00
				Email to L. Hannah regarding alleged misrepresentation re:regarding settlement communications, including proof that representations were accurate.	
03/13/2019	AZM	.10	MB	AZM	\$42.50
				Telephone conference with client to confirm Court's cancellation of settlement conference due to Defendants' position regarding resolution.	
06/04/2019	AZM	.50	MB	AZM	\$212.50
				Review Court's opinion regarding summary judgment.	
06/04/2019	AZM	.10	MB	AZM	\$42.50
				Correspondence to opposing counsel to confer on liquidated damages.	
06/04/2019	AZM	2.00	AZM	AZM	\$850.00
				Prepare motion for liquidated damages.	
07/01/2019	AZM	.10	MB	AZM	\$42.50
				Telephone conference with L. Hannah regarding imposition of liquidated damages to confer re: motion for same.	
07/11/2019	AZM	.10	MB	AZM	\$42.50
				Finalize and file motion for liquidated damages.	
07/30/2019	AZM	.10	AZM	AZM	\$42.50
				Communications with opposing counsel regarding resolution.	
08/06/2019	AZM	1.00	AZM	AZM	\$425.00
				Review of time entries in anticipation of submission of motion for attorneys' fees.	

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08/08/2019	AZM	2.20	AZM	AZM	\$935.00
				Prepare motion, memorandum of law, and proposed order for motion for attorneys' fees.	
08/10/2019	AZM	2.30	AZM	AZM	\$977.50
				Prepare reply on motion for liquidated damages, including research regarding sufficiency of consultation with accountant.	
08/12/2019	AZM	.80	AZM	AZM	\$340.00
				Finalize reply on motion for liquidated damages.	
Total hours:		155.60		Total Amount:	\$66,130.00